

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION	Page 1	Page 9
	A/N(s) 563673-563675	Date 6/20/14
	Processed by JPV	Reviewed by

APPLICANT'S NAME: MERCURY PLASTICS INC.

MAILING ADDRESS: 14849 SALT LAKE AVENUE
CITY OF INDUSTRY, CA 91746

EQUIPMENT LOCATION: 14835 SALT LAKE AVENUE
CITY OF INDUSTRY, CA 91746

COMPANY ID. NO.: 58563

EQUIPMENT DESCRIPTION:

Application no. 563673 (Title V Permit Revision)

TITLE V PERMIT REVISION, DE MINIMIS SIGNIFICANT.

Application no. 563674 (PC, New construction)

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. REGENERATIVE THERMAL OXIDIZER #3, TELLKAMP SYSTEMS, MODEL NO. 30 ROXIDIZER, 11'-0" W. X 30'-0" L. X 13'-1" H., WITH ONE MAXON, KINEDIZER LE, NATURAL GAS-FIRED, 2,400,000 BTU PER HOUR START-UP BURNER, TWO HEAT EXCHANGER BEDS WITH CERAMIC SADDLES, A STANDBY NATURAL GAS INJECTION SYSTEM, AND ONE 5 HP. COMBUSTION AIR BLOWER.
2. EXHAUST SYSTEM WITH PERMANENT TOTAL ENCLOSURE #4, 48' W. X 70' L. X 30' H., AND A 12.5-HP. EXHAUST FAN, VENTING ONE HEAT-SET FLEXOGRAPHIC PRINTING PRESS (PRESS NO. 11).

Application no. 563675 (PC, New construction)

FLEXOGRAPHIC PRINTING SYSTEM NO. 11 CONSISTING OF:

1. PRESS NO. 11, FISCHER & KRECKE, MODEL FLEXPRESS 36S, SERIAL NO. 3126/58296, 10-COLOR, 77-INCH WEB WIDTH.
2. DRYER, WITH TWO MAXON, OVENPAK LE, LOW-NOX NATURAL GAS-FIRED BURNERS, 7,000,000 BTU PER HOUR TOTAL, 3,500,000 BTU PER HOUR EACH.
3. IN PERMANENT TOTAL ENCLOSURE #4.

HISTORY:

Mercury Plastics, Inc. submitted applications nos. 563674 and 563675 on May 9, 2014 for permits to construct one new regenerative thermal oxidizer (RTO #3) and one new heat-set flexographic printing press. The RTO will have a Maxon, Kinedizer LE, low-NO_x start-up

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burner. The flexographic printing press will have two Maxon Ovenpak LE low-NO_x burners. The facility will be required to source test both equipment prior to issuance of the permits to operate in order to demonstrate compliance with District rules and regulations, including BACT requirements, and NO_x emission requirements per Rule 1147(c)(1).

Both equipment will be included under the existing facility-wide VOC cap of 4463 lbs of VOC per calendar month. The printing press will be limited by permit condition to a maximum of 900 lbs of VOC per month.

The facility also submitted A/N 563673 for the Title V permit revision since this facility is in the Title V program. The previous Title V renewal facility permit was issued on May 6, 2012. This permit revision is the 2nd revision since this last Title V renewal. Also included with this revision is the modification to the existing APC system to replace the burners in the RTOs with low-NO_x burners to comply with Rule 1147 (see separate evaluation).

This facility has not been issued a notice of violation in the past two years. However, one notice to comply, NC #E20883, was issued in April 2, 2013 to provide daily and monthly VOC records during 2012, daily gas usage for ovens, and 4/1/13 records for start-up temperature. According to enforcement reports, the case was closed on 4/25/13. No complaints have been issued against this facility in the past two years.

PROCESS DESCRIPTION:

This company manufactures plastic bags from pellets; the bags are used for frozen foods, fertilizers, and trash bags. The plastic bags are manufactured onsite, and then cooled prior to printing in the flexographic press. Once printed, the web of plastic is perforated to form tear-off serrations. The web of bags is then wound up to rolls. This air pollution control system will be used to control this one heat-set flexographic printing press. The APC is sized to accommodate another heat-set flexographic printing press, which the company expects to add within the year.

EMISSION CALCULATIONS:

VOC emissions, flexographic printing operations (A/N 563675):

The new flexographic printing press will use inks and solvents that result in VOC emissions during the printing and drying process. The equipment will be limited to a maximum of 900 lbs of VOC/mo emitted to the atmosphere. The average and maximum operating hours of this equipment will be 24 hours/day, 4 days/wk and 52 weeks/year. The RTO is expected to meet a minimum 95% overall efficiency for VOC.

Maximum VOC Emissions:

Maximum VOC emissions to be based on maximum equipment VOC limit of 900 lb/mo.

$$R2_{\max} = 900 \text{ lb VOC/mo}$$

$$900 \text{ lbs/mo} \rightarrow 30 \text{ lbs/day @ 30 days/mo}$$

$$30 \text{ lbs/day} \rightarrow 1.25 \text{ lbs/hr @ 24 hrs/day}$$

$$\rightarrow 10,800 \text{ lbs/yr @ 52 wks/yr}$$

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$$R1_{\max} = \frac{R2_{\max}}{(1-0.95)} = 18000 \text{ lb VOC/mo}$$

$$18000 \text{ lbs/mo} \rightarrow 600 \text{ lbs/day @ 30 days/mo}$$

$$600 \text{ lbs/day} \rightarrow 25 \text{ lbs/hr @ 24 hrs/day}$$

Average Emissions:

The average emissions are conservatively based on average expected material usage provided by the applicant.

Avg. ink usage = 24 gal/day @ 3.54 lb VOC/gal

Avg. thinner/clean-up usage = 3 gal/day @ 6.78 lb VOC/gal

Avg. operating hrs = 24 hrs/day

$$\begin{aligned} \text{Avg VOC emissions} &= R1_{\text{avg}} = \text{VOC}_{\text{ink}} + \text{VOC}_{\text{thinner/clean-up}} \\ &= \left[24 \frac{\text{gals ink}}{\text{day}} \cdot \frac{3.54 \text{ lb VOC}}{\text{gal mat'l}} \right] + \left[\frac{3 \text{ gal mat'l}}{\text{day}} \cdot \frac{6.78 \text{ lb VOC}}{\text{gal mat'l}} \right] \\ &= 85 \text{ lb VOC/day} + 20.3 \text{ lb/day} \\ &= 105.3 \text{ lb VOC/day} = 4.39 \text{ lb VOC/hr @ 24 hrs/day} \\ R2_{\text{avg}} &= R1_{\text{avg}} (1-0.95) = 105.3 \text{ lb VOC/day} (1-0.95) = 5.3 \text{ lb/day} \\ &\rightarrow 0.22 \text{ lb/hr} \rightarrow 159 \text{ lbs/mo} \rightarrow 1908 \text{ lbs VOC/yr @ 24 hr/day; 7 days/wk; 52 wks/yr} \end{aligned}$$

Combustion emissions, flexographic printing press heat-set dryer (A/N 563675):

The new heat-set flexographic printing press has two 3.5 mmBTU/hr natural gas-fired, low-NO_x burners. The combustion emissions were calculated using spreadsheets, which are in this file as Attachments 1 and 2. See the following emissions summary table for maximum hourly and daily emissions from this equipment. NO_x is guaranteed at 30 ppm and CO @ 250 ppm, corrected to 3% O₂.

Combustion Emissions, Start-up Burner from RTO #3 (A/N 563674):

Fuel = natural gas

Max. burner heat input rating = 2.4 mmBTU/hr

Ave. operating hours = 2 hrs/day, 1 day/wk, 50 wks/yr

Max. operating hours = 24 hrs/day, 7 days/wk, 52 wks/yr

Refer to Attachment 1 for detailed emissions

The new RTO #3 will have a 2.4 mmBTU/hr start-up burner that will be used raise the ceramic bed to operating temperature. The set-point will be 1500°F. It will then switch to a gas injection mode where natural gas is injected directly into the combustion chamber as needed to maintain the minimum operating temperature. The applicant has not requested that a limit be imposed on the operating hours of the start-up burner. Therefore, maximum emissions will be based on the default 24 hrs/day, 7 day/week. Average emissions will be based on 2 hr/day, which is the maximum expected time it will take for the ceramic bed to get to 1500°F from a cold start.

See the file for the spreadsheet for CO, PM₁₀, ROG, SO_x and R1401 TAC emissions. The following table summarizes the emissions of CO, NO_x, PM₁₀ and ROG for this equipment.

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Summary of Maximum Combustion Emission Increases

A/N	Burner rating (BTU/hr)	CO		NO _x		PM ₁₀		ROG		GHG
		(lb/hr)	(lb/day)	(lb/hr)	(lb/day)	(lb/hr)	(lb/day)	(lb/hr)	(lb/day)	
563674	2,400,000	0.44	10.6	0.09	2.11	0.02	0.41	0.016	0.38	281
563675	7,000,000	1.29	31.0	0.26	6.14	0.05	1.20	0.047	1.12	818
Total		1.73	41.6	0.35	8.25	0.07	1.61	0.063	1.5	1099

Notes: R1 = R2 for combustion emissions.

RTO Design:

Process gas inlet temp.	200°F
Stack outlet temp. (max.)	400°F
Operating temp from combustion chamber	1500-1600°F
Heat exchanger efficiency	95%
Volume of the combustion zone	1613 ft ³
Combustion air blower (flow rate/hp)	640 scfm / 5 hp.
Heat input rating of the burner	2.4 mmBTU/hr
Maximum design air flow capacity	30,000 scfm (total not to exceed, variable speed)

The new RTO has a variable speed exhaust fan with a maximum process air flow capacity of 30,000 scfm. The ducting to the RTO is dampered. Approximately, 15,000 scfm will be used to vent the proposed PTE, which will contain the new flexographic printing press no. 11. During start-up, a 5-hp. combustion air blower will be used to provide combustion air and to circulate air through the combustion chamber to heat up the ceramic bed to operating temperature. No process air is introduced during start-up.

Worst Case – Heat required to heat air from 70°F to 1475°F:

$$\begin{aligned}
 M &= 640 \text{ scfm} \times 0.075 \text{ lb/scf} \times 60 \text{ min/hr} = 2,880 \text{ lb/hr} \\
 Cp_{70} &= 0.240 \text{ Btu/lb-}^\circ\text{F} \\
 Cp_{1475} &= 0.272 \text{ Btu/lb-}^\circ\text{F} \\
 Cp_{avg} &= 0.256 \text{ Btu/lb-}^\circ\text{F} \\
 Q &= MCp \Delta T \\
 &= 2,880 \times 0.256 \times (1475 - 70) \\
 &= 1.036 \text{ mmBtu/hr}
 \end{aligned}$$

After 95% heat recovery:

$$\begin{aligned}
 Q &= 1.036 \times 0.05 = 0.518 \text{ Btu/hr} \\
 \text{Heat input needed} &= 0.518 \times 1050/632 \text{ (AP 40, page 948, Table D7)} \\
 &= 0.086 \text{ mmBtu/hr}
 \end{aligned}$$

Therefore, the 2.4 mmBtu/hr rated start-up burner in the RTO should be sufficient to heat the bed and maintain the required combustion chamber temperature. Once this occurs, the start-up burner is shut off. During operation with VOC laden process air, the contaminated airflow is expected to be sufficient for combustion to be self-sustaining. If

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and when necessary, natural gas fuel injection will maintain the set combustion temperature.

Residence time calculation:

Total flow rate = 30,000 cfm (at design capacity)
Q (flow rate per second) = 30,000 cfm x [(1475 + 460)/(70 + 460)] x (15.1/14.7) psia
= 112509 cfm/60 sec/min = 1875.1 cu. ft.

Residence time = V/Q = combustion chamber vol./flow rate = 1875.1/1613 = 1.16 sec
1.16 sec ≥ 0.3 sec recommended residence time

Rule 1401 Emissions

There are no products that will be processed through this equipment that will contain carcinogenic compounds. However, several inks and a thinner/clean-up solvent that will be used in the printing press, will contain isopropanol (IPA). IPA is a toxic air contaminant. Based on material safety data sheets provided by the applicant, IPA is contained in up to 5% by wt. in several inks, and up to 90% in a thinner and clean-up solvent. A worst-case emission rate will assume that all of the allowable monthly emissions (900 lbs VOC/mo) will be IPA. Therefore, the hourly IPA emission rate would be 1.25 lb/hr. Toxic emissions from combustion of natural gas are calculated in the attached spreadsheets.

RULES AND REGULATIONS

RULE 212, SIGNIFICANT PROJECT PUBLIC NOTIFICATION

A public notice will be required if one or more of the criteria is met:

- this equipment is located within 1000 feet of a school
- the increase in emissions exceeds the limits in subdivision (g), or
- the toxic emissions result in an MICR of more than one in a million on a worst-case basis.

However, a public notice is not required for this project since the equipment is not within 1000 feet of a school, there will be no significant increase in emissions [below Rule 212(g) thresholds], and the increase in MICR due to the combustion emissions in the oven and oxidizer was $<1 \times 10^{-6}$ ($\leq 4.6 \times 10^{-8}$ actual).

Maximum Daily Emissions (lb/day)

	CO	NO _x	PM ₁₀	ROG	Pb
Actual	41.6	8.25	1.61	0	0
Allowable Emissions	220	40	30	30	0
Notice Required	No	No	No	No	No

RULE 401, VISIBLE EMISSIONS

Visible emissions from the operation of this equipment are not expected. No notices of violation, or complaints have been issued in the past two years for nuisance. One notice to comply was issued in the past two years but it was not related to visible emissions.

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RULE 402, NUISANCE

The operation of this equipment is expected to comply with this rule. Operation of the equipment is not expected to result in any odors. No notices of violation, or complaints have been issued in the past two years for nuisance. One notice to comply was issued in the past two years but non-nuisance related.

RULE 407: LIQUID AND GASEOUS AIR CONTAMINANTS

This equipment is required to emit carbon monoxide (CO) not to exceed 2000 ppmv, measured on a dry basis, averaged over 15 consecutive minutes. The facility will be required to source test both burners prior to the issuance of a permit to operate in order to demonstrate compliance with this requirement and Rule 1147 NO_x limits. The new RTO burner is guaranteed by the manufacturer to meet 250 ppmv CO @ 3% O₂. See letter in this file (A/N 563674). The CO from the oven is expected to be < 2000 ppmv based on source tests on similar burners.

RULE 1130, GRAPHIC ARTS

This equipment will be operated using printing inks with over 2.5 lb/gal, however they will comply with the rule through the use of an RTO which is expected to reduce VOC emissions by greater than 95% overall control efficiency. A minimum destruction efficiency of 95%, and collection efficiency of 90%, is required by Rule 1130(c)(5) for flexographic printing operations. The printing operations will be contained and conducted within a permanent total enclosure (PTE), through which 100% collection efficiency is expected. The facility will be required to demonstrate that the PTE meets the EPA Method 204 criteria. The facility will also be required to conduct a source test to demonstrate compliance with these requirements prior to the issuance of a permit to operate. Compliance with this rule is expected.

Material VOC Content (Rule 1130)

	Actual (lb VOC/gal)	Allowable (lb VOC/gal)
Flexographic ink: Non-porous substrate	3.54	2.5

Note: The proposed flexographic printing operations shall comply with the VOC content requirements of Rule 1130(c)(1) through the use of an approved emission control system [Rule 1130(c)(5), ≥95% destruction efficiency, and ≥90% collection efficiency].

RULE 1147: NO_x REDUCTIONS FROM MISCELLANEOUS SOURCES

The RTO will have a Maxon, Kinedizer LE, 2,400,000 BTU/hr natural gas-fired start-up burner. The heat-set flexographic printing press will have two Maxon, Ovenpak LE, 7,000,000 BTU/hr total, natural gas-fired burners. According to the manufacturer, the Kinedizer LE burner is guaranteed to produce ≤30 ppmv NO_x @ 3% O₂, and <250 ppmv CO. See letter in the file (A/N 563674). The Maxon Ovenpak LE burners were selected based on their expectation to meet Rule 1147 requirements of 30 ppmv NO_x @ 3% O₂. Prior to issuance of permits to operate, the facility will be required to source test both burners (RTO during start-up only) to demonstrate that the new burners can meet the NO_x emission requirement of 60 ppm @ 3% O₂ for the RTO and 30 ppm @ 3% O₂ for the printing press dryer [per Rule 1147(c)(1)].

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RULE 1171, SOLVENT CLEANING OPERATIONS

The flexographic printing operations will use cleaning solvent with more than 25 g/l, however the facility is expected to comply with the VOC content requirements of Rule 1171(c) through the use of an RTO. The printing & cleaning operations will be contained and conducted within a permanent total enclosure (PTE), through which 100% collection efficiency is expected. The facility will be required to demonstrate that the PTE meets the EPA Method 204 criteria. The facility will be required to conduct a source test on the RTO to demonstrate that it has a destruction efficiency of at least 95% [per Rule 1171(c)(5)]. Compliance is expected.

Material VOC Content (Rule 1171)

	Actual VOC g/l (lb/gal)	Allowable VOC g/l (lb/gal)
Cleaning of ink application equipment, Flexographic printing	813 (6.78)	25 (0.21)

Note: The proposed clean-up operations shall comply with the VOC content requirements of Rule 1171(c)(1) through the use of an approved emission control system [Rule 1171(c)(5), $\geq 95\%$ destruction efficiency, and $\geq 90\%$ collection efficiency].

REGULATION XIII:

BACT: There will be an increase of <2.1 lb/day of NO_x emissions from the operation of the start-up burner on the RTO. The RTO has a low- NO_x burner, which will be required to demonstrate through a source test that it meets the 30 ppm NO_x BACT limit. The manufacturer has also given a guarantee of 250 ppm CO @ 3% O_2 , which will also be tested. The flexographic printing press will emit up to 900 lbs/day of VOC emissions. It will be vented to the RTO to control VOC emissions by at least 95%. The oven has low- NO_x burners that are expected to meet 30 ppm NO_x @ 3% O_2 . The facility will be required to source test the RTO to demonstrate its overall VOC control efficiency, destruction efficiency and PTE, as well as demonstrate compliance with the NO_x BACT requirement on the start-up burner. A source test will also be required on the oven for NO_x and CO to verify compliance with the 30 ppm NO_x BACT limit. Compliance is expected.

Offsets: Operation of the new RTO and flexographic printing press is expected to result in a combined increase of 8.25 lbs NO_x /day, 1.61 lb PM_{10} /day, and 1.5 lb/day of ROG from combustion of natural gas in the oven and RTO. So there will be no increase in VOC emissions from the facility, the existing facility cap of 4463 lb/month will be reduced (by $1.5 \times 30 = 45$ lb) to 4418 lb/month. The facility has agreed to this adjustment to the facility VOC cap. The VOC emissions from the new press will be bubbled under the new, reduced facility cap of 4418 lbs/month. Offsets will not be required for NO_x and PM_{10} since the facility NO_x and PM_{10} emissions are below 4 tpy [exempt under Rule 1304(d)]. There will also be an increase of 11 of CO/day from the RTO and 31 lb of CO/day from the press, but offsets are not required for CO since the District is in attainment for CO.

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Modeling: There will be an increase of CO, NO_x and PM₁₀ emissions from this project. However, the maximum CO, NO_x and PM₁₀ emission increases will be below the maximum allowable emissions for combustion sources 2<x<5 mmBTU/hr for the RTO, and <5<x<10 for the heat-set flexographic printing press (Table A-1). See the summary table below. Therefore, no further modeling is required.

**Summary of Maximum Emission Increases
for Source Modeling Analysis**

Burner Rating, (mmBtu/hr)	NO _x Emissions		CO Emissions		PM ₁₀ Emissions	
	Calculated (lb/hr)	Allowed (lb/hr)	Calculated (lb/hr)	Allowed (lb/hr)	Calculated (lb/hr)	Allowed (lb/hr)
2<x<5 (new RTO #3)	0.09	0.31	0.44	17.1	0.02	1.9
5<x<10 (new press)	0.26	0.47	1.3	25.9	0.05	2.8

RULE 1401, MAXIMUM INDIVIDUAL CANCER RISK ASSESSMENT

There will not be a significant increase in health risk as a result of this project. Isopropanol (IPA) is the only toxic contained in several inks and solvents to be used in the flexographic printing press (A/N 563675). However, even if the maximum amount of VOC allowed to be emitted from this equipment (1.25 lb/hr, or 900 lb/mo) were IPA, this would still be below the screening emission level allowed (<3.2 lb/hr @ 50m nearest receptor distance). A permit condition will be added to the press to not allow any other Rule 1401 TACs, except for IPA. There are very small quantities of toxic emissions from the combustion of natural gas in the oven and RTO. The MICR due to the operation of the new RTO and its 2.4 mm BTU/hr start-up burner, and the heat-set flexographic printing press oven are expected to be $<1 \times 10^{-6}$ ($\leq 7.2 \times 10^{-8}$ and 2.1×10^{-7} , respectively). The HIA/HIC for both the RTO and press/oven will be <1.0. See attached emission calculations and screening risk assessment spreadsheets. Therefore, compliance with this rule is expected.

REG XXX, TITLE V

This facility is not in the RECLAIM program. This project is considered as a “de minimis significant permit revision” to the last Title V permit renewal, issued to this facility on May 6, 2012. Rule 3000 (b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases on non-RECLAIM pollutants or hazardous air pollutants (HAP) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

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Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the second permit revision since the second Title V renewal issued to this facility on May 6, 2012. Also included with this revision is the replacement of burners in RTO # 1 and #2 with low NO_x burners to comply with Rule 1147 (see separate evaluation A/N 560822). The following table summarizes cumulative emission increases resulting from this permit revision.

	Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
1 st revision	Addition of a new flexographic printing press, PC-PO A/N 550631	0	0	0	0	0	0
2 nd revision	Replacement of burners in RTO #1 and RTO #2 with low-NO _x burner, PC A/N 560822	0	0	-9	0	0	18
	New construction of RTO #3 and heat-set flexographic printing press with dryer, PC A/N 563674-563375	0	0	8	1	0	42
	Cumulative Total	0	0	-1	1	0	60
	Maximum Daily	30	30	40	30	60	220

RECOMMENDATIONS:

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimis significant permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to the facility (Section D).